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U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Procedure Change Notification
Groundwater Monitoring Program
Granville Solvents Site
Granville, Licking County, Ohio
USEPA ID: OHD004495412

Dear Ms. Sullivan,

AECOM, on behalf of the Granville Solvents Site Removal Management Group, LLC, is submitting this notification regarding groundwater sampling procedures at the referenced site. These revised procedures will be used for the 2012 semi-annual and subsequent sampling events. The following provides an explanation for and description of the change.

Performance monitoring is defined by the Post-Shutdown Contingency Plan (Contingency Plan) dated January 31, 2005. The Contingency Plan includes a groundwater monitoring program consisting of semi-annual sampling of a minimum of eight (8) designated wells. Collected samples have been analyzed for VOCs following the procedures outlined in the *Groundwater Monitoring Program Plan for the Granville Solvents Site in Granville, Ohio* (M&E 1995) (Groundwater Monitoring Plan). Procedures for sampling groundwater are outlined in Sections 4.6 and 5.2.4 of the Groundwater Monitoring Plan and generally consist of using a submersible pump to purge 3 to 5 well volumes followed by extracting groundwater at a rate of 100 mL per minute to fill the sample vials.

The submersible pumps currently utilized at the site to collect groundwater samples consist of a Grundfos™ dedicated sampling pump and dedicated tubing. The pumps and tubing are in poor condition and several are not functional. The seals on most of the wellhead manifolds are not water tight, potentially causing any surface water entering the flush-mount boxes to enter the well casing.

In order to meet the requirement in Section 4.6 of the Groundwater Monitoring Plan to collect groundwater samples that are representative of groundwater within the aquifer at each monitoring well location, the monitoring wells will be purged and sampled using the following low-flow methods.

Purging

A non-dedicated pneumatic or electric submersible bladder pump with pump controller will be utilized to purge each monitoring well. The pump will be slowly lowered to the mid-point of the well screen and the pumping rate (100-500 mL/min.) for each well will be adjusted until it will be equal to the natural groundwater flow velocity. This be will be determined by measuring water column levels during pumping. A water quality meter with a flow-through cell will be utilized to monitor groundwater stabilization criteria, which will be collected every 3 to 5 minutes. A minimum of 3 sets of indicator parameters will be collected followed by additional sets until 3 consecutive readings meet the stabilization criteria. The well will be considered purged after the following parameters have stabilized:

Parameter	Stabilization Criteria
pH	± 0.1
Specific electric conductance	± 3%
Temperature	± 0.5°C
Turbidity	± 10% (when turbidity will be greater than 10 NTUs)

The pump used to purge and sample the wells will be decontaminated between sampling locations in accordance with Section 5.2.1 of the Groundwater Monitoring Plan. New disposable polyethylene bladders and tubing will be used between each well.

Sampling

The submersible pump and low-flow methods will be used to collect the groundwater samples. The in-line, flow-through water quality cells used during well purging will be disconnected prior to filling the sample bottles.

The existing dedicated sampling pump and tubing at each of the following wells will be replaced with a standard water-tight cap:

- MW-02D
- MW-04D
- MW-06
- MW-07D
- MW-08
- MW-P1
- GSSMW-15
- GSSEW-01
- GSSMW-08; and
- GSSMW-09.

Sampling reports will include a summary of the purge data and any deviations from this procedure will be noted.

If you have any questions regarding this procedure change, please contact me at (513) 878-6844 or e-mail me at ron.roelker@aecom.com.

Sincerely yours,

Ron Roelker, PE
Senior Project Manager

Mike Papp
Project Geologist

Cc: Bill Brewer, PhD, Granville Solvents SRM Group Site Manager
Fred Myers, Ohio EPA, DERR